

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
MINA CHANG
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6055
mina.chang@usdoj.gov
Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER KOSTAN,

Defendant.

No. 2:21-00081-APG-DJA

**Stipulation To Continue Initial
Appearance on Alleged Violations of
Conditions of Probation
(First Request)**

The parties, by and through the undersigned, respectfully submit the following
Stipulation and Proposed Order for the Court's consideration.

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned
counsel for the government and undersigned counsel for the defendant, Alexander Kostan,
that the initial appearance relating to violations of probation in the above-captioned matter,
currently set for March 7, 2024, at 2:30 p.m. be vacated and continued to a date and time
convenient to the Court, but no sooner than 14 days.

This Stipulation is entered into for the following reasons:

1. On or about February 23, 2024, U.S. Probation filed a petition for a
summons based on alleged violations of defendant's conditions of probation in the above-
captioned case.

2. A summons was issued for defendant Alexander Kostan's initial appearance on March 7, 2024.

3. Defendant Alexander Kostan's prior attorney of record, Robert Langford, Esq., would like to represent defendant in this matter, but is unavailable due to being currently out of the district and requires a two-week continuance of the initial appearance date.

4. The parties agree to the continuance of initial appearance date.

5. Defendant Alexander Kostan remains out of custody and does not oppose a continuance.

6. The additional time requested by this stipulation is made in good faith and not for purposes of delay.

7. This is the first request for a continuance of the initial appearance.

DATED this 6th day of March, 2024.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Robert Langford
ROBERT LANGFORD, Esq.
Counsel for Defendant
Alexander KOSTAN

/s/ Mina Chang
MINA CHANG
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER KOSTAN,

Defendant.

Case No. 2:21-00081-APG-DJA

~~[PROPOSED]~~ ORDER

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter coming on the parties' Stipulation To Continue Initial Appearance, the Court having considered the premises therein, and for good cause shown, the Court accepts the Stipulation and finds as follows:

1. On or about February 23, 2024, U.S. Probation filed a petition for a summons based on alleged violations of defendant's conditions of probation in the above-captioned case.
2. A summons was issued for defendant Alexander Kostan's initial appearance on March 7, 2024 at 2:30 p.m.
3. Defendant Alexander Kostan's prior attorney of record, Robert Langford, Esq., would like to represent defendant in this matter, but is unavailable due to being currently out of the district and requires a two-week continuance of the initial appearance date.
4. The parties agree to the continuance of initial appearance date.

1 5. Defendant Alexander Kostan remains out of custody and does not oppose a
2 continuance.

3 6. The additional time requested by this stipulation is made in good faith and not for
4 purposes of delay.

5 **ORDER**

6 IT IS THEREFORE ORDERED that the initial appearance in the above-captioned
7 matter, previously scheduled for March 7, 2024, at 2:30 p.m. is vacated and continued until
8 March 21, 2024 at 2:30 p.m. in Courtroom 3A.

9
10 DATED: March 7, 2024

11 
12 _____
13 HON. ELAYNA J. YOUCHAH
14 U.S. MAGISTRATE JUDGE
15
16
17
18
19
20
21
22
23
24